

Thank you for the opportunity to submit testimony on this important bill affecting the application of pesticides in Connecticut.

The complexity of controlling "pests" in and on soil and grass is allowing dangerous accumulations to collect and build up around us. The ever changing chemical makeup and exceptions will allow this to go unchecked. That is why we are in complete agreement with Rivers Alliance on this matter and wish to restate their testimony.

"There are numerous diseases, disorders, and pests that can affect soil and grass. Today it's grubs, tomorrow rust disease, next summer slime mold -- always something. More exemptions will always be sought.

The perennial search for a pesticide that magically kills only the target without harming anything else has led to the development of some improved products. But with a billion pounds of pesticides released in the US every year, how much toxicity is really harmless ? And how many pesticides are introduced as perfectly safe and then turn out not to be.

A new relatively less toxic pesticide for grubs is chlorantraniliprole (Acelepryn™). I believe it is a product that could be permitted under this bill. The DuPont website offered an encouraging analysis of its safety and effectiveness, followed by this warning. **"This pesticide is toxic to aquatic invertebrates, oysters and shrimp. Do not apply directly to water. Drift and runoff may be hazardous to aquatic organisms in water adjacent to use sites."**

Many athletic fields and lawns are right alongside water. We at the (Naugatuck River Revival Group) urge the committee to continue its work for pesticide-free playing areas, and healthy streams and wetlands.

This bill will expand the protection of children, pets, and wildlife from exposure to pesticides. The category of pesticides as defined here includes herbicides, insecticides, fungicides (used on plants), and rodenticides. Pesticides are toxins designed to kill or otherwise adversely affect living things regarded as pests.

As Rivers Alliance states: under this bill, a modified version of the existing ban on pesticides at schools and daycare facilities through eighth grade will be extended to state parks, athletic fields, and playgrounds. The modifications, such as certain qualified exemptions for pesticide products, will not apply to municipal or regional schools or to private schools (or other private property). In other words, the existing ban will remain the same.

The bill extends the pesticide ban that exists now at schools and daycare facilities to state-managed lawns and turf at state parks, playgrounds,

athletic fields, hospitals (fast disappearing), prisons, state-owned roadside lawns, and so forth. But it does not ban pesticide use on state golf courses; state schools, colleges, and universities; or state-owned land used for professional sports or related activities.

The most obvious modification of the existing ban is in the amendment to Section 1. This includes a difficult-to-follow set of definitions. (We) believe the primary intent of the language in the exclusions, or exemptions, listed in subparagraphs A, B, and C is to allow the use of certain benign non-toxic substances that may help in controlling animal or plant pests.

It's not quite clear that exemptions under C would always be benign. This is an exemption for materials under EPA rule 40 CFR 152.25. These exemptions are for "minimum risk" pesticides. So they are in fact pesticides, and it appears from the EPA website that whether such pesticides are "minimal" is to a degree determined by the manufacturer.

A more prominent problem arises with the exemption at D, "a grub control product that is registered with the [EPA] that does not contain a signal label with a caution, warning or danger indication, and except for such pesticides described in subparagraphs (A) and (C) of this subsection, is subject to the restrictions in Sec. 10 231b for an emergency application of a lawn care pesticide."? Is this saying that grub-control "products," some of which are pesticides, are not being banned unless the package has an official warning label?

(We) read this as allowing certain grub pesticides to be used on state operated properties but not on municipal or school lawns or athletic fields (through grade eight). Is this correct?

Is there a typo relating to (A) microbial or biochemical pesticides; (B) horticultural soaps or oils; (C) minimum risk pesticides; and (D) grub-control pesticides. The bill seems to say that all but (A) and (C), must be used only in a verified emergency as prescribed in Sec. 10-231b. In other words, (B) horticultural soaps and oils as well as (D) grub control products are not quite entirely exempt. They can only be used in an emergency.

(For clarity, it would be helpful transfer up the definitions of "microbial pesticide" and "biochemical pesticide" at the end of Sec. 1 to somewhere prior to their first use.)

The NRRG believes that **this is not the time to back down from support for pesticide-free lawns and turf**. The immediate problem reportedly is grubs. Parks and recreation managers are complaining they can't control them.

One of RA's volunteers is a trained turf manager, and research by him and many, many others indicates that grubs are not a problem when there is

healthy soil and grass. Maintenance of healthy soil and turf does requires some knowledge and forethought. For example, it is important to start grub treatment in the fall; aeration of the soil with coring and spiking is extremely important, and should be done monthly and more often during grub season. Watering should be infrequent but deep, which strengthens this grass roots. Overseed all year. Roll the fields. Adjust the pH of the soil (usually should be slightly acidic). Adjust the mowing to the type of grass and the season, And so forth.

One successful fields manager told RA that it is important to have the support of the athletic department and school administration. Not all fields can be played on all the time. There must be some sort of rotation, even if only a part of field is being rested. Failure to maintain and rest fields leads to escalating problems. Compacted soil, weak grass, degradation of top soil, loss of beneficial biota, and so on. The more fertilizer and pesticides one pours on, the more toxic the environment becomes."

We want to thank the chairmen and the committee for their leadership on this issue.

Respectfully,

Kevin Zak
President